

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.
)	
Plaintiff,)	JUDGE
)	
v.)	
)	
\$42,102.00 IN U.S. CURRENCY SEIZED)	
ON DECEMBER 11, 2017, PURSUANT)	
TO THE EXECUTION OF A FEDERAL)	
SEARCH WARRANT,)	
)	
Defendant.)	

COMPLAINT IN FORFEITURE

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, and James L. Morford, Assistant U.S. Attorney, and files this Complaint in Forfeiture, respectfully alleging as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

JURISDICTION AND INTRODUCTION

1. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. Section 1345, and over an action for forfeiture under 28 U.S.C. Section 1355(a). This Court also has jurisdiction over this particular action under 18 U.S.C. Section 981(a)(1)(C).

2. This Court has *in rem* jurisdiction over the defendant currency pursuant to: (i) 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) 28 U.S.C. Section 1355(b)(1)(B), incorporating 28 U.S.C. Section 1395, because the action accrued in this district.

3. Venue is proper in this district pursuant to: (i) 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) 28 U.S.C. Section 1395 because the action accrued in this district.

4. This Court will have control over the defendant currency through service of an arrest warrant *in rem*, which the United States Marshals Service will execute upon the defendant currency. *See*, Supplemental Rule G(3)(b) and G(3)(c).

5. On December 11, 2017, agents of the U.S. Postal Service Office of Inspector General (USPS OIG) – assisted by Postal Inspectors of the U.S. Postal Inspection Service (USPIS) - seized the defendant \$42,102.00 in U.S. Currency (hereinafter, the defendant currency) at the East 59th Street, Cleveland, Ohio, residence of Jennifer Riccardi, a postal service employee. The seizure was made pursuant to the execution of a federal search warrant.

6. The defendant currency is now in the custody of the federal government.

7. The USPIS commenced an administrative forfeiture proceeding against the defendant currency. A claim to the defendant currency was submitted in the administrative forfeiture proceeding by Jennifer Riccardi, thereby requiring the filing of this judicial forfeiture action.

8. The defendant currency is subject to forfeiture to the United States under 18 U.S.C. Section 981(a)(1)(C) in that it constitutes – or is derived from - proceeds traceable to a violation(s) of 18 U.S.C. Section 1708 (mail theft).

FORFEITURE

9. Jennifer Riccardi was a postal service employee, who worked at the Cleveland Processing and Distribution Center, located at 2400 Orange Avenue, Cleveland, Ohio.

10. On December 7, 2017, at approximately 4:50 p.m., a USPS OIG Special Agent observed Riccardi remove U.S. mail from her assigned work area - placing the items in her personal bag - and go on her lunch break. Riccardi was observed leaving her work area at approximately 5:00 p.m. and head directly to the employee entrance/exit, where she used her USPS employee badge to exit the building.

11. On December 11, 2017, beginning at approximately 2:00 p.m., USPS OIG agents again conducted surveillance of Riccardi. OIG agents observed Riccardi remove mail – particularly, two large bundles of processed letter mail - from her assigned work machine and place it into a soft-sided cooler/lunch bag. OIG agents also observed Riccardi place an additional bundle of processed letter mail into a soft-sided shoulder bag.

12. At approximately 5:00 p.m., OIG agents observed Riccardi leave her work area and exit the building through the employee entrance/exit located on Broadway Avenue. Riccardi departed the parking lot in her personal vehicle. She returned at approximately 5:29 p.m.

13. OIG agents approached Riccardi as she was exiting her vehicle and identified themselves to her. The agents advised Riccardi that they wanted to speak with her inside the building.

14. At the outset of the interview, the OIG agents identified themselves and read an advisement of rights form to Riccardi. She stated that she understood her rights, initialed and signed the form, and agreed to speak to the agents. Among other things, the following transpired during the interview:

- a.) Riccardi stated that she has been a postal service employee for the past two years, beginning in October or November of 2015, and that she has always been assigned to the Cleveland Processing and Distribution Center as a postal support employee/clerk.
- b.) Riccardi stated her lunch break is always at 5:00 p.m.
- c.) Riccardi stated her primary duty is working on the machines that get raw incoming collection mail from the loading docks. The mail then flows through her machine, which cancels the stamps and sorts the mail. The machines break down the processed mail into 12 separate "bins", which include Cleveland, Akron, Toledo, Cincinnati, Columbus, Pennsylvania, and "orange mail" (i.e., bills).
- d.) Riccardi was told that OIG agents witnessed her take mail she processed that evening and place it inside her cooler/lunch bag.
- e.) Further, Riccardi was shown a video clip taken that evening that showed her placing a thick stack of mail inside her cooler/lunch bag.
- f.) Riccardi was asked to explain what was going on. She stated that she began stealing mail around Thanksgiving of 2017. She knew people (customers) send cash and gift cards through the mail.
- g.) Riccardi was asked what she did with the mail she stole that day. She stated that she took it home during her lunch break. Riccardi said she put the stolen mail in her cooler/lunch bag and her shoulder bag prior to leaving the building for her lunch break. She further stated that she stole all greeting cards, looking for cash and gift cards.
- h.) Riccardi stated that she has stolen, at the most, 20-25 pieces of mail in any given shift, because that is all she could fit inside her bag.
- i.) Riccardi was asked how many pieces she stole on Thursday, December 7, 2017. She stated that she stole approximately 20 greeting cards.
- j.) Riccardi stated that if she finds checks, she throws them out.
- k.) Riccardi stated that she usually puts the stolen mail pieces in a plastic bag when she is done going through it, then throws it away at a gas station, usually the BP gas station by her house.
- l.) Riccardi stated that the house she currently lives in is her boyfriend's house. Her boyfriend's mother owns the house, but she [the mother] does not live there.

- m.) Riccardi stated that she snorts heroin, but not when she went home that evening during her lunch break.
- n.) Riccardi stated that there are a couple grams of heroin in a plastic baggie in the living room and a gun on top of the refrigerator.
- o.) Riccardi was asked if she had any gift cards on her that she had stolen from the mail. Riccardi removed her wallet and produced three Visa gift cards and one Marathon gift card. Riccardi stated that she stole them from the mail the prior week.
- p.) Riccardi stated that she has stolen Target gift cards, but has not used them. She said she would sell the Target gift cards to people on the streets and that a lot of people will give you 50 cents on the dollar for the cards.
- q.) Riccardi then admitted that she probably began stealing in August of 2017, and not Thanksgiving of 2017.
- r.) Riccardi said sometimes she burns (previously stolen mail), and sometimes she just throws it away.

15. During the interview, Riccardi was asked if she would consent to a search of her vehicle. Riccardi consented to the search and signed a Consent to Search form for the vehicle, which was parked in the employee lot.

16. A search of Riccardi's vehicle was conducted and Macy gift card backers, Subway gift cards, and miscellaneous receipts were recovered.

17. Receipts from Subway showed gift card redemptions made on August 23, 2017 and December 1, 2017.

18. Another receipt found inside Riccardi's vehicle was from the store The Gift Card Loop. The receipt was dated December 23, 2016, and showed the sale of numerous gift cards to the store for a cash payout.

19. At approximately 11:53 p.m. on December 11, 2017, OIG agents and USPIS Postal Inspectors executed a federal search warrant at Riccardi's East 59th Street, Cleveland,

Ohio, residence. Among other things, the following items were seized from the following locations:

A. Kitchen:

- (i) Bersa BP9CC 9mm semi-automatic handgun, serial number D57968, loaded with one magazine.

B. Family Room:

- (i) 80 pieces of first class U.S. mail (sealed).
- (ii) 28 pieces of first class U.S. mail (opened/rifled).
- (iii) 2 - \$180.00 U.S. Postal Service money orders.
- (iv) 352 gift cards (various retailers/restaurants).
- (v) 2 gift certificates.
- (vi) \$8,967.00 in U.S. Currency.
- (vii) various types and amounts of drug paraphernalia (syringes, razor blades, straws, bottle caps with drug residue).

C. Office:

- (i) 1,147 gift cards (various retailers/restaurants).

D. Kitchen Storage:

- (i) \$33,135.00 in U.S. Currency.
- (ii) 3 miscellaneous gift cards.
- (iii) money counter (in box) with receipt.

E. Second Level Loft:

- (i) 4 spoons with residue.
- (ii) 2 personal checks in other persons' names.
- (iii) mortar and pestle with residue.

20. The defendant \$42,102.00 in this case is the total of the \$8,967.00 U.S. Currency seized from the family room of the residence [paragraph 19(B)(vi)] and the \$33,135.00 U.S. Currency seized from the kitchen storage area [paragraph 19(D)(i)].

CONCLUSION

21. By reason of the foregoing, the defendant \$42,102.00 in U.S. Currency is subject to forfeiture to the United States under 18 U.S.C. § 981(a)(1)(C) in that it constitutes – or is derived from – proceeds traceable to a violation(s) of 18 U.S.C. § 1708 (mail theft).

WHEREFORE, plaintiff, the United States of America, requests that this Court enter judgment condemning the defendant currency and forfeiting it to the United States, and providing that the defendant currency be delivered into the custody of the United States for disposition according to law, and for such other relief as this Court may deem proper.

Respectfully submitted,

Justin E. Herdman
U.S. Attorney, Northern District of Ohio

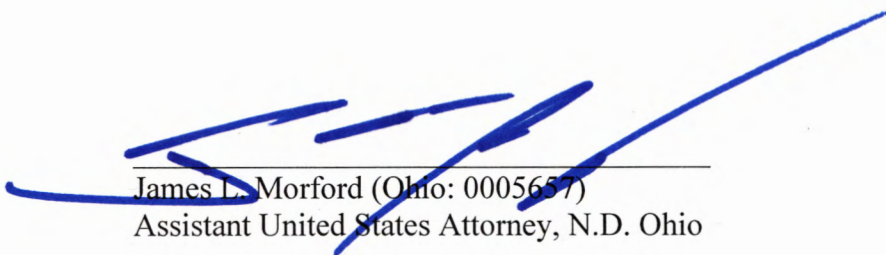
By: 

James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio
Carl B. Stokes U.S. Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
216.622.3743 / Fax: 216.522.7499
James.Morford@usdoj.gov

VERIFICATION


STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

I, James L. Morford, under penalty of perjury, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and the attorney for the plaintiff in the within entitled action. The foregoing Complaint in Forfeiture is based upon information officially provided to me and, to my knowledge and belief, is true and correct.



James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio

Sworn to and subscribed in my presence this 15th day of May, 2018.



Notary Public

DANIEL R. RANKE, Attorney At Law
Notary Public - State of Ohio
My commission has no expiration date.
Section 147.03 O. R. C.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

James L. Morford, Assistant U.S. Attorney - 400 U.S. Court House,
801 West Superior Avenue, Cleveland, Ohio 44113 - 216.622.3743

DEFENDANTS

\$42,102.00 in U.S. Currency seized on December 11, 2017, pursuant to the execution of a federal search warrant.

County of Residence of First Listed Defendant Cuyahoga County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify) _____
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

civil forfeiture action under 18 U.S.C. Section 981(a)(1)(C).

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

05/24/2018

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE:

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

I. Civil Categories: (Please check one category only).

1. ☒ General Civil
2. ☐ Administrative Review/Social Security
3. ☐ Habeas Corpus Death Penalty

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action is ☐ **RELATED** to another **PENDING** civil case. This action is ☐ **REFILED** pursuant to LR 3.1.

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

COUNTY: Cuyahoga County

Corporation For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY:

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

EASTERN DIVISION

☐

AKRON

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)

☒

CLEVELAND

(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake, Lorain, Medina and Richland)

☐

YOUNGSTOWN

(Counties: Columbiana, Mahoning and Trumbull)

WESTERN DIVISION

☐

TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.
)	
Plaintiff,)	
)	JUDGE
v.)	
)	
\$42,102.00 IN U.S. CURRENCY SEIZED)	
ON DECEMBER 11, 2017, PURSUANT)	
TO THE EXECUTION OF A FEDERAL)	
SEARCH WARRANT,)	
)	
Defendant.)	PRAECIPE

The United States of America respectfully requests that the Clerk of this Court issue the attached Warrant of Arrest *in Rem* to the United States Marshals Service (USMS) pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Respectfully submitted,

Justin E. Herdman
U.S. Attorney, Northern District of Ohio

By:


James L. Morford (Ohio: 0005657)
Assistant United States Attorney, N.D. Ohio
Carl B. Stokes U.S. Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
216.622.3743 / Fax: 216.522.7499
James.Morford@usdoj.gov

United States District Court

NORTHERN DISTRICT OF OHIO

WARRANT OF
ARREST *IN REM*

TO: THE UNITED STATES MARSHAL AND/OR ANY OTHER DULY AUTHORIZED LAW
ENFORCEMENT OFFICER:

WHEREAS, on May 24, 2018 a Complaint in Forfeiture
was filed in this Court by Justin E. Herdman, United States Attorney for this District, on behalf of the United
States, against:

\$42,102.00 in U.S. Currency seized on December 11, 2017, pursuant to the execution of a federal search
warrant

(CATS Asset ID No.: 18-UPS-000679)

and WHEREAS, the defendant currency is currently in the possession, custody, or control of the United
States; and,

WHEREAS, Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset
Forfeiture Actions directs the Clerk of the Court to issue a Warrant of Arrest *In Rem* for the arrest of the
defendant currency; and,

WHEREAS, Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset
Forfeiture Actions provides that the Warrant of Arrest *In Rem* must be delivered to a person or organization
authorized to execute it;

YOU ARE COMMANDED to arrest the defendant currency by serving a copy of this warrant on the
custodian in whose possession, custody, or control the currency is presently found, and to use whatever means may
be appropriate to protect and maintain it in your custody until further order of this Court.

YOU ARE FURTHER COMMANDED to file the same in this Court with your return thereon.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT	
DATE	CLERK		
May 24, 2018	(BY) DEPUTY CLERK		
Returnable <u>-60-</u> days after issue.			
UNITED STATES MARSHALS SERVICE			
DISTRICT	DATE RECEIVED	DATE EXECUTED	
U.S. MARSHAL			

U.S. Department of Justice
United States Marshals Service

PROCESS RECEIPT AND RETURN

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF United States of America	COURT CASE NUMBER
DEFENDANT \$42,102.00 U.S. Currency Seized on December 11, 2017	TYPE OF PROCESS Warrant of Arrest in Rem

SERVE AT { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
\$42,102.00 U.S. Currency Seized on December 11, 2017 (CATS Asset ID No.: 18-UPS-000679).
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW James L. Morford, Assistant U.S. Attorney Office of the United States Attorney, Northern District of Ohio Carl B. Stokes U.S. Court House, 801 West Superior Avenue, Suite 400 Cleveland, Ohio 44113 - office: 216.622.3743	Number of process to be served with this Form 285	1
	Number of parties to be served in this case	1
	Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Fold

\$42,102.00 U.S. Currency seized on December 11, 2017, pursuant to the execution of a federal search warrant (CATS Asset ID No.: 18-UPS-000679).

Signature of Attorney other Originator requesting service on behalf of:	<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NUMBER 216.622.3743	DATE 5/24/18
---	---	----------------------------------	-----------------

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY-- DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
	No. _____	No. _____	No. _____		

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)	<input type="checkbox"/> A person of suitable age and discretion then residing in defendant's usual place of abode
Address (complete only different than shown above)	Date
	Time <input type="checkbox"/> am <input type="checkbox"/> pm
Signature of U.S. Marshal or Deputy	

Service Fee	Total Mileage Charges including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)
					\$0.00

REMARKS:

PRINT 5 COPIES:

1. CLERK OF THE COURT
2. USMS RECORD
3. NOTICE OF SERVICE
4. BILLING STATEMENT*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal.
5. ACKNOWLEDGMENT OF RECEIPT

PRIOR EDITIONS MAY BE USED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.
)	
Plaintiff,)	JUDGE
)	
v.)	
)	
\$42,102.00 IN U.S. CURRENCY SEIZED)	
ON DECEMBER 11, 2017, PURSUANT)	
TO THE EXECUTION OF A FEDERAL)	
SEARCH WARRANT,)	
)	
Defendant.)	NOTICE OF FORFEITURE

To: Jennifer Riccardi
4103 East 59th Street
Cleveland, Ohio 44105

The above-captioned forfeiture action was filed in U.S. District Court on May 24, 2018.

A copy of the Complaint in Forfeiture is attached. If you (Jennifer Riccardi) claim an interest in the defendant currency, the following applies.

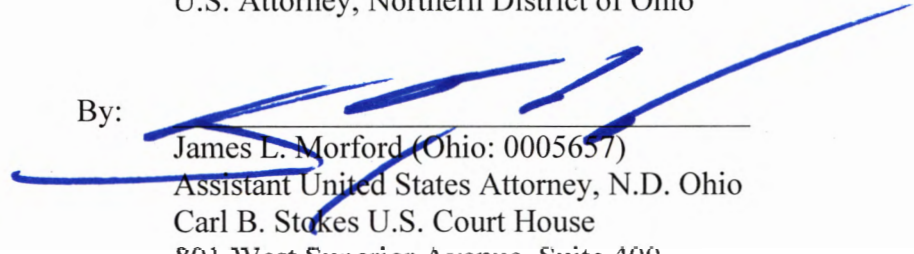
Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, you are required to file with the Court, and serve upon James L. Morford, plaintiff's attorney, whose address is United States Attorney's Office, 400 United States Court House, 801 West Superior Avenue, Cleveland, Ohio 44113, a verified claim to the defendant currency within 35 days after your receipt of the complaint. The claim shall contain the information required by Rule G(5) of the said Supplemental Rules. Additionally, you must

file and serve an answer to the complaint, or a motion under Rule 12 of the Federal Rules of Civil Procedure, within 20 days after the filing of the claim, exclusive of the date of filing. If you fail to do so, judgment will be taken for the relief demanded in the complaint.

Respectfully,

Justin E. Herdman
U.S. Attorney, Northern District of Ohio

By:



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James.Morford@usdoj.gov

Date: May 24, 2018